

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

VERONICA ANN TIOKASIN

INDICTMENT

Case No. _____

Violations: 18 U.S.C. § 924(a)(1)(A)

COUNT ONE

False Statement During the Purchase of a Firearm

The Grand Jury Charges:

On or about May 20, 2022, in the District of North Dakota,

VERONICA ANN TIOKASIN

knowingly made a false statement and representation to Bills Gun Shop and Range Fargo, Federal Firearm License Number: 3-45-017-07-4J-00953, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Bills Gun Shop and Range Fargo, Federal Firearm License Number: 3-45-017-07-4J-00953, in that VERONICA ANN TIOKASIN did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that she was the actual transferee/buyer of the firearm being purchased, whereas in truth and in fact, she was purchasing the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT TWO

False Statement During the Purchase of Firearms

The Grand Jury Further Charges:

On or about June 16, 2022, in the District of North Dakota,

VERONICA ANN TIOKASIN

knowingly made a false statement and representation to Bills Gun Shop and Range Fargo, Federal Firearm License Number: 3-45-017-07-4J-00953, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Bills Gun Shop and Range Fargo, Federal Firearm License Number: 3-45-017-07-4J-00953, in that VERONICA ANN TIOKASIN did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that she was the actual transferee/buyer of the firearms being purchased, whereas in truth and in fact, she was purchasing the firearms for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT THREE

False Statement During the Purchase of Firearms

The Grand Jury Further Charges:

On or about June 24, 2022, in the District of North Dakota,

VERONICA ANN TIOKASIN

knowingly made a false statement and representation to Bills Gun Shop and Range Fargo, Federal Firearm License Number: 3-45-017-07-4J-00953, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Bills Gun Shop and Range Fargo, Federal Firearm License Number: 3-45-017-07-4J-00953, in that VERONICA ANN TIOKASIN did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that she was the actual transferee/buyer of the firearms being purchased, whereas in truth and in fact, she was purchasing the firearms for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE NOTICE

Upon conviction of any or all of the offense(s) alleged in this Indictment,

VERONICA ANN TIOKASIN

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense(s), including, but not limited to, the following:

- One Taurus, Model G2C, .40 caliber pistol, with Serial Number ADC062666;
- One Glock, Model 43, 9mm caliber pistol, with Serial Number AFZD189;
- One SCCY, Model CPX-2, 9mm caliber pistol, with Serial Number C400580;
- One Taurus, Model G2C, 9x19 caliber pistol, with Serial Number 1C126817; and
- One SCCY, Model CPX-2, 9mm caliber pistol, with Serial Number C424694.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney

RML/tah